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November 17, 2020

Client/Matter No. 22826/1

**Via eCourts**

Honorable John Michael Vazquez  
United States District Court  
District of New Jersey  
Frank R. Lautenberg U.S.P.O and Courthouse  
2 Federal Square, Room 417  
Newark, New Jersey 07102

Re: Daniel D'Ambly v. Christian Exoo a/k/a Antifash Gordon, et als.  
Civil Action No. 2:20-cv-12880-JMV-JAD

Dear Judge Vazquez:

This office represents Defendant, Cohen, Weiss and Simon LLP ("CWS"). On November 9, 2020, CWS filed a motion to Dismiss Count XIII of Plaintiff's Complaint, which is returnable before Your Honor on December 7, 2020. On November 17, 2020 CWS served upon Plaintiff's counsel a Motion for Sanctions pursuant to Fed.R.Civ.P. 11 (c). These pleadings were served upon Plaintiff's counsel in accordance with the 21-day safe harbor period under Fed.R.Civ.P. 11 (c) (4) and will not be filed with the Court until after the expiration of the 21-day safe harbor period.

As the pending motion to dismiss the Complaint is scheduled for December 7, 2020, we respectfully request that the Court carry the motion to dismiss until the next motion date of December 21, 2020 so that Plaintiff will have the full 21-day safe harbor period in which to dismiss the Complaint with prejudice before the Court rules on the motion to dismiss.

Very truly yours,



MJC/cmt

MICHAEL J. CANNING

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cc: Patrick Trainor, Esq. *(via eCourts)*  
Lauren James-Weir, Esq. *(via eCourts)*  
Richard Scharlat, Esq. *(via eCourts)*  
Christopher Marlborough, Esq. *(via eCourts)*